

Nicoletti Hornig & Sweeney  
Guerric S.D.L. Russell  
Attorneys for Plaintiff  
Matthew Carson  
505 Main Street, Suite 106  
Hackensack, New Jersey 07601  
Tel: (201) 343-0970

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

In the Matter of the Complaint	:	
	:	
of	:	CIVIL ACTION NO.:
	:	
MATTHEW CARSON, as Owners of the vessel	:	
TAMMY LYNN, a 2005 28' Mako Model	:	<b>AD INTERIM</b>
284CC (HIN: MRKTM064C505) for Exoneration	:	<b>STIPULATION</b>
from or Limitation of Liability	:	<b><u>FOR VALUE</u></b>

WHEREAS, Plaintiff Matthew Carson ("Plaintiff"), as owner of the vessel TAMMY LYNN, filed a Complaint in this Court demanding exoneration from or limitation of liability in respect of all loss, damage, injury or death arising out of an incident on July 11, 2015 as more fully described in the Complaint; and

WHEREAS, in the said Complaint Plaintiff demands, among other things, that this Court issue (1) a Notice to all persons asserting claims with respect any loss, damage, injury or death arising out of said incident admonishing them to file their respective claims and answers, if any, to the said Complaint, and (2) an injunction enjoining the commencement and further prosecution of all actions, suits and proceedings with respect to such claims against the Plaintiff, as aforesaid, and against the said vessel and any other property of the Plaintiff, except in this proceeding; and

WHEREAS, the Plaintiff wishes to prevent the commencement and the further prosecution of all actions, suits and proceedings of any nature or description in any and all courts

against the Plaintiff, the said vessel and any other property of the Plaintiff and the Plaintiff also wishes to provide a stipulation for value, in the preliminary amount established in the Complaint, as security for the benefit of claimants, pending any further appraisalment of the amount or value of the Plaintiff's interest in the said vessel and her pending freight as the Court may hereafter order; and

WHEREAS, pending further appraisalment as may be ordered by the Court, the amount or value of the Plaintiff's interest in the said vessel and her pending freight following the said incident is not more than \$40,000.00 as established in the Complaint and the Plaintiff and its stipulator, Seaworthy Insurance Company, an insurer authorized to do business in the State of New Jersey, hereby consenting and agreeing for the benefit of claimants herein that if judgment is awarded against the Plaintiff, the judgment may be entered against Plaintiff and the stipulator and each of them for an amount not exceeding the above-stated amount with interest thereon from this date and that thereupon execution therefor may issue against their and each of their goods, chattels, lands and tenements or other real estate; and

WHEREAS, pursuant to Local Admiralty and Maritime Rule (f), the Plaintiff and the stipulator, Seaworthy Insurance Company, hereby consenting and agreeing to post for the purposes of bonding the amount of \$250.00 for costs making \$40,250.00 the total amount of security posted for all claims and costs.

NOW, THEREFORE, the condition of this stipulation is such that if the Plaintiff and Seaworthy Insurance Company, the stipulator undersigned, shall abide by all orders of the Court, interlocutory and final, and pay the amount awarded by the final judgment rendered by this Court, and by any appellate court, if an appeal intervenes, with interest as aforesaid, then this stipulation to be void otherwise to remain in full force and effect.

Date: 6 October, 2015

Seaworthy Insurance Company

By: Vince Corteselli  
Vince Corteselli  
Authorized Representative

STATE OF VIRGINIA )  
 ) s.s.:  
COUNTY OF ALEXANDRIA CITY )

On the 6<sup>th</sup> day of October, 2015 before me personally came Vince Corteselli, to me known, who, being by me duly sworn, did depose and say that he is an authorized representative of Seaworthy Insurance Company with an office at 880 South Pickett Street, Alexandria, VA 22304; that he acknowledged the signing of the foregoing instrument; that he is authorized to sign the aforesaid instrument on behalf of Seaworthy Insurance Company and that he signed the aforesaid instrument pursuant to such authority.

Date: 6 October, 2015

Trisha Anne Brady  
Notary Public

TRISHA ANNE BRADY  
NOTARY PUBLIC  
REG. #7237685  
COMMONWEALTH OF VIRGINIA  
MY COMMISSION EXPIRES NOVEMBER 30, 2017